

**LPDES PERMIT NO. LA0101419, AI No. 17897**

**LPDES STATEMENT OF BASIS  
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM  
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA**

**Company/Facility Name:** Targa Midstream Services Limited Partnership  
Venice Gas Plant / Venice Stabilizer Plant  
1565 Tidewater Road  
Venice, LA 70091

**Issuing Office:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services (Office)  
P. O. Box 4313  
Baton Rouge, LA 70821-4313

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**Date Prepared:** July 6, 2009

**I. Permit Action/Status:**

**Reason For Permit Action:**

Proposed reissuance of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46.

In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC 33:IX Chapter 11) will not have dual references.

**LAC 33:IX Citations:** Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

**40 CFR Citations:** Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

**A. LPDES permit - Individual LPDES Permit**  
LPDES permit effective date: February 1, 2003  
LPDES permit expiration date: January 31, 2008

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B. Application received on January 31, 2008.

**II. Facility Information:**

A. Location - At the end of Tidewater Road, off of LA Highway 23, south of Venice, Plaquemines Parish.  
Latitude 29°14'14", Longitude 89°23'06"

B. Applicant Activity -

According to the application, Targa Midstream Services Limited Partnership, Venice Gas Plant / Venice Stabilizer Plant, is a natural gas processing plant. This facility receives unpurified natural gas from offshore (via pipeline). Natural gas liquids are recovered from the gas. Residue gas (purified natural gas) from the facility (consisting principally of methane) is delivered to pipeline. Products from the facility (natural gas liquids) are delivered by pipeline. This facility consists of two cryogenic processing trains. Residue gas is compressed using gas turbine engines driving centrifugal compressors. Both cryogenic processing trains share a common utility system for electrical power, treated water, steam generation, and flare. The source of water supply for the facility is brackish water from Pass Tante Phine (approximately 196,000 gallons per day).

C. Sources of technology based limits:

Current Permit (effective February 1, 2003)

General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004)

LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA)

LDEQ Sanitary Discharge General Permits

Current practices regarding treated sanitary wastewater discharges in individual permits.

Best Professional Judgment (BPJ)

Light Commercial Facilities General Permit LAG480000

D. Fee Rate -

- i) Fee Rating Facility Type: Minor
- ii) Complexity Type: II
- iii) Wastewater Type: II
- iv) SIC Code: 1321

E. Continuous Facility Effluent Flow – 196,000 GPD

**III. Receiving Waters:** Pass Tante Phine and Red Pass

A. River Basin: Mississippi River, Segment No. 070401

B. Designated Uses:

The designated uses are primary contact recreation, secondary contact recreation, fish and wildlife propagation, and oyster propagation.

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**IV. Outfall Information:**Outfall 001

- A. Type of wastewater – the continuous discharge of once through cooling water from the Venice Gas Plant utilities area.
- B. Location – monitored at the point of discharge at the southern tip of the facility, prior to mixing with waters of the State, at Latitude 29°13'56", Longitude 89°23'00".
- C. Treatment - None
- D. Flow - Continuous, 196,000 GPD (Currently not in service.)
- E. Receiving waters – Pass Tante Phine, via effluent pipe.
- F. Basin and segment - Mississippi River Basin, Segment 070401.

Outfall 002

- A. Type of wastewater – the intermittent discharge of treated process area stormwater, washdown, boiler blowdown, separator dumps, process wastewater, condensation water, dehydrator water, and reverse osmosis water from the Venice Gas Plant.
- B. Location - monitored at the point of discharge at the northeast corner of the facility, prior to mixing with waters of the State, at Latitude 29°14'09"; Longitude 89°22'54".
- C. Treatment – Oil Removal, Aerobic, and Biological.
- D. Flow – Intermittent, 13,000 GPD.
- E. Receiving waters – Pass Tante Phine, via effluent pipe thence into pump basin.
- F. Basin and segment - Mississippi River Basin, Segment 070401.

Outfall 003

- A. Type of wastewater – the intermittent discharge of stormwater runoff from process areas and treated sanitary wastewater (from Internal Outfall 102), from the Venice Gas Plant.
- B. Location – monitored at the point of discharge from the open ditch in the southeast portion of the plant, prior to mixing with waters of the State, at Latitude 29°14'11", Longitude 89°22'55".
- C. Treatment - None

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- D. Flow - Intermittent, 31,659 GPD.
- E. Receiving waters – Pass Tante Phine, via unnamed ditch thence into pump basin.
- F. Basin and segment - Mississippi River Basin, Segment 070401.

Outfall 004

- A. Type of wastewater – the intermittent discharge of emergency overflow of stormwater runoff from the Venice Gas Plant.
- B. Location – monitored at the point of discharge in the southwest portion of the plant, prior to mixing with waters of the State, at Latitude 29°14'04", Longitude 89°23'00".
- C. Treatment - None
- D. Flow - Intermittent, 0 GPD (Normally No Discharge; emergency overflow only.)
- E. Receiving waters – Pass Tante Phine, via effluent pipe thence into unnamed ditch.
- F. Basin and segment - Mississippi River Basin, Segment 070401.

Outfall 005

- A. Type of wastewater – the intermittent discharge of stormwater runoff from Venice Stabilizer Plant containment areas.
- B. Location – monitored at the point of discharge in the east part of the Venice Stabilizer Plant, prior to mixing with waters of the State, at Latitude 29°14'04", Longitude 89°23'05".
- C. Treatment - None
- D. Flow - Intermittent, 547,000 GPD
- E. Receiving waters – Pass Tante Phine, via effluent pipe thence into unnamed ditch.
- F. Basin and segment - Mississippi River Basin, Segment 070401.

Outfall 006

- A. Type of wastewater – the intermittent discharge of treated sanitary wastewater from the Venice Stabilizer Plant.
- B. Location – monitored at the point of discharge from the sewage treatment plant located near the southwest corner of the facility, prior to mixing with waters of the State, at Latitude 29°14'04", Longitude 89°23'10".

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- C. Treatment – Activated Sludge sanitary sewage treatment package plant.
- D. Flow - Intermittent, 0 GPD (Currently not in service.)
- E. Receiving waters – Red Pass, via effluent pipe.
- F. Basin and segment - Mississippi River Basin, Segment 070401.

Internal Outfall 102

- A. Type of wastewater – the intermittent discharge of treated sanitary wastewater from the Venice Gas Plant.
- B. Location – monitored at the point of discharge from the treatment package plant, near the center of the facility, prior to mixing with waters of the State, at Latitude 29°14'01", Longitude 89°22'09".
- C. Treatment – Activated Sludge sanitary sewage treatment package plant.
- D. Flow - Intermittent, 1,500 GPD
- E. Receiving waters – Pass Tante Phine, via effluent pipe thence into final Outfall 003.
- F. Basin and segment - Mississippi River Basin, Segment 070401.

**V. Proposed Changes from Current Permit:**

Summary of proposed changes from the current LPDES permit:

Internal Outfall 102 will now flow into final Outfall 003, instead of final Outfall 002.

Outfall 002

Change the discharge types in the outfall description from “washdown, boiler blowdown, separator dumps, process wastewater, condensation water, dehydrator water, treated sanitary wastewater, and stormwater” to “treated process area stormwater, washdown, boiler blowdown, separator dumps, process wastewater, condensation water, dehydrator water, and reverse osmosis water”. “COD measurement frequency” will be reduced from “2/week” to “1/week”, for the permittee demonstrated two or more consecutive years of permit compliance. Due to washdown and process wastewater, TSS discharge limitations will be added with a 45 mg/L daily maximum, in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004). Due to boiler blowdown, washdown, process stormwater, and process wastewater, TOC discharge limitations will be added with a 50 mg/L daily maximum, in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004). Due to changing from continuous to intermittent discharge, Oil & Grease discharge limitations will be changed from a 8.3 lbs/day daily average and a 24 lbs/day daily maximum, to a 15 mg/L daily maximum, in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7,

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2004). Due to changing from continuous to intermittent discharge, COD discharge limitations will be changed from a 167 lbs/day daily average and a 489 lbs/day daily maximum, to a 125 mg/L daily maximum, in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004). BOD<sub>5</sub> discharge limitations and monitoring requirements will be removed, due to treated sanitary wastewater being removed as a discharge type in the outfall description. (Internal Outfall 102 will now flow into final Outfall 003, instead of final Outfall 002.)

**Outfall 003**

Change the discharge types in the outfall description from "stormwater runoff from the Venice Gas Plant process area" to "stormwater runoff from process areas and treated sanitary wastewater (from Internal Outfall 102), from the Venice Gas Plant".

**Outfall 005**

Change part of the outfall description from "process areas" to "containment areas".

**Outfall 006**

Due to the high level and number of Fecal Coliform exceedances, as reported in the DMR review covering the period of July 2, 2006 to July 2, 2009, this monitoring frequency will be increased from "semiannually" to "quarterly".

**Internal Outfall 102**

BOD<sub>5</sub> discharge limitations will be added with a 45 mg/L daily maximum, in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004). (Internal Outfall 102 will now flow into final Outfall 003, instead of final Outfall 002.) Due to the high level and number of Fecal Coliform exceedances, as reported in the DMR review covering the period of July 2, 2006 to July 2, 2009, this monitoring frequency will be increased from "semiannually" to "quarterly".

**VI. Permit Limit Rationale:**

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

**A. Outfall 001** – the continuous discharge of once through cooling water from the Venice Gas Plant utilities area.

This discharge shall be limited and monitored by the permittee according to the following schedule:

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<u>PARAMETER</u>	<u>DAILY AVERAGE</u>	<u>DAILY MAXIMUM</u>	<u>MONITORING FREQUENCY</u>
Flow	Report (GPD)	Report (GPD)	1/month
COD (low level) (net)	23 (mg/L)	NA	1/month
Temperature	NA	48.3 (°C)	1/month
pH	6.0 - 9.0 s.u. (Min – Max)		1/month

Site-Specific Consideration(s)

**Flow** - Established in accordance with LAC 33:IX.2707.1.1.b and the current permit. Flow shall be estimated once a month. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**COD (low level) (net)** - Effluent limitations are established in accordance with BPJ and the current permit, at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

In the Response to Comments for the Draft NPDES Permit with a Public Notice dated June 4, 1983, the U.S. E.P.A. approved the Company's request to monitor COD instead of TOC. The proposed 5 mg/L TOC (net) daily average limit was based on net limitation provisions of 40 CFR 122.63(h) [May 19, 1980] and once-through cooling water provisions of 40 CFR 419.12(d) [October 18, 1982]. October 18, 1982 Guidelines also stated that limits shall be established at a ratio of 2.2 mg/L TOC to 1 mg/L BOD, in absence of adequate correlation data. The U.S. E.P.A. Region VI Rationale for gas processing plants imposed limits of 20 mg/L BOD daily average and 200 mg/L COD daily average. Thus, as shown in the calculation below, a daily average limit of 23 mg/L COD (net) was determined for this outfall.

$$(5 \text{ mg/L TOC})(1 \text{ mg/L BOD} / 2.2 \text{ mg/L TOC})(200 \text{ mg/L COD} / 20 \text{ mg/L BOD}) = 23 \text{ mg/L COD}$$

**Temperature** - Effluent limitations are established in accordance with BPJ and the current permit, at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**pH** - Effluent limitations are established in accordance with BPJ, the current permit, and the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), at a frequency of once a month. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

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- B. **Outfall 002** - the intermittent discharge of treated process area stormwater, washdown, boiler blowdown, separator dumps, process wastewater, condensation water, dehydrator water, and reverse osmosis water from the Venice Gas Plant.

This discharge shall be limited and monitored by the permittee according to the following schedule:

<u>PARAMETER</u>	<u>DAILY AVERAGE</u>	<u>DAILY MAXIMUM</u>	<u>MONITORING FREQUENCY</u>
Flow	Report (GPD)	Report (GPD)	1/week
TSS	NA	45 (mg/L)	1/week
TOC	NA	50 (mg/L)	1/week
COD	NA	125 (mg/L)	1/week
Oil & Grease	NA	15 (mg/L)	1/week
pH	6.0 - 9.0 s.u. (Min - Max)		1/week

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.1.1.b and the current permit. Flow shall be estimated once a week. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**TSS** - Effluent limitations are established in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004) and the Light Commercial Facilities General Permit LAG480000, at a frequency of once a week. These requirements have been added to the previous LPDES permit, effective on February 1, 2003.

**TOC** - Effluent limitations are established in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a week. These requirements have been added to the previous LPDES permit, effective on February 1, 2003.

**COD** - Effluent limitations are established in accordance with BPJ, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and the Light Commercial Facilities General Permit LAG480000, at a frequency of once a week. These requirements have been changed from the previous LPDES permit, effective on February 1, 2003.

**Oil and Grease** - Effluent limitations are established in accordance with BPJ, the General Rationale for Natural Gas Processing Plants and Compressor Stations



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(revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a week. These requirements have been changed from the previous LPDES permit, effective on February 1, 2003.

**pH** – Effluent limitations are established in accordance with BPJ, the current permit, and the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), at a frequency of once a week. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

- C. **Outfall 003** - the intermittent discharge of stormwater runoff from process areas and treated sanitary wastewater (from Internal Outfall 102), from the Venice Gas Plant.

This discharge shall be limited and monitored by the permittee according to the following schedule:

<u>PARAMETER</u>	<u>DAILY AVERAGE</u>	<u>DAILY MAXIMUM</u>	<u>MONITORING FREQUENCY</u>
Flow	Report (GPD)	Report (GPD)	1/quarter
TOC	NA	50 (mg/L)	1/quarter
Oil & Grease	NA	15 (mg/L)	1/quarter
pH	6.0 - 9.0 s.u. (Min – Max)		1/quarter

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.1.1.b and the current permit. Flow shall be estimated once a quarter. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**TOC** - Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a quarter. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**Oil and Grease** - Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at

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a frequency of once a quarter. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**pH** – Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a quarter. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**D. Outfall 004** - the intermittent discharge of emergency overflow of stormwater runoff from the Venice Gas Plant.

This discharge shall be limited and monitored by the permittee according to the following schedule:

<u>PARAMETER</u>	<u>DAILY AVERAGE</u>	<u>DAILY MAXIMUM</u>	<u>MONITORING FREQUENCY</u>
Flow	Report (GPD)	Report (GPD)	1/quarter
TOC	NA	50 (mg/L)	1/discharge event
Oil & Grease	NA	15 (mg/L)	1/discharge event
pH	6.0 - 9.0 s.u. (Min – Max)		1/discharge event

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.1.1.b and the current permit. Flow shall be estimated once a quarter. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**TOC** - Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once per discharge event. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**Oil and Grease** - Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once per discharge event. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

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**pH** – Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once per discharge event. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

- E. **Outfall 005** - the intermittent discharge of stormwater runoff from Venice Stabilizer Plant containment areas.

This discharge shall be limited and monitored by the permittee according to the following schedule:

<u>PARAMETER</u>	<u>DAILY AVERAGE</u>	<u>DAILY MAXIMUM</u>	<u>MONITORING FREQUENCY</u>
Flow	Report (GPD)	Report (GPD)	1/quarter
TOC	NA	50 (mg/L)	1/quarter
Oil & Grease	NA	15 (mg/L)	1/quarter
pH	6.0 - 9.0 s.u. (Min – Max)		1/quarter

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.1.1.b and the current permit. Flow shall be estimated once a quarter. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**TOC** - Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a quarter. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**Oil and Grease** - Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a quarter. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

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**pH** – Effluent limitations are established in accordance with the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a quarter. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**F. Outfall 006** - the intermittent discharge of treated sanitary wastewater from the Venice Stabilizer Plant.

This discharge shall be limited and monitored by the permittee according to the following schedule:

<u>PARAMETER</u>	<u>DAILY MAXIMUM</u>	<u>MONITORING FREQUENCY</u>
Flow	Report (GPD)	1/6 months
BOD <sub>5</sub>	45 (mg/L)	1/6 months
TSS	45 (mg/L)	1/6 months
Fecal Coliform	43 (colonies/ 100 ml)	1/3 months
pH	6.0 - 9.0 s.u. (Min – Max)	1/6 months

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.1.1.b and the current permit. Flow shall be estimated semiannually. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**BOD<sub>5</sub>** - Effluent limitations are established in accordance with the current permit, current practices regarding treated sanitary wastewater discharges in individual permits, LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD<sub>5</sub> and TSS in terms of concentration. The monitoring frequency is once every six months. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**TSS** - Effluent limitations are established in accordance with the current permit, current practices regarding treated sanitary wastewater discharges in individual

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permits, LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD<sub>5</sub> and TSS in terms of concentration. The monitoring frequency is once every six months. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**Fecal Coliform** - Effluent limitations are established in accordance with the current permit, current practices regarding treated sanitary wastewater discharges in individual permits, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. The monitoring frequency has been increased from once every six months to once every three months. These requirements have been changed from the previous LPDES permit, effective on February 1, 2003.

**pH** - Effluent limitations are established in accordance with LAC 33:IX.1113.C.1, the current permit, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. The monitoring frequency is once every six months. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**G. Internal Outfall 102** - the intermittent discharge of treated sanitary wastewater from the Venice Gas Plant.

This discharge shall be limited and monitored by the permittee according to the following schedule:

<u>PARAMETER</u>	<u>DAILY MAXIMUM</u>	<u>MONITORING FREQUENCY</u>
Flow	Report (GPD)	1/6 months
BOD <sub>5</sub>	45 (mg/L)	1/6 months
TSS	45 (mg/L)	1/6 months
Fecal Coliform	43 (colonies/ 100 ml)	1/3 months

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#### Site-Specific Consideration(s)

**Flow** - Established in accordance with LAC 33:IX.2707.1.1.b and the current permit. Flow shall be estimated semiannually. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**BOD<sub>5</sub>** - Effluent limitations are established in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), current practices regarding treated sanitary wastewater discharges in individual permits, LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD<sub>5</sub> and TSS in terms of concentration. The monitoring frequency is once every six months. These requirements have been added to the previous LPDES permit, effective on February 1, 2003.

**TSS** - Effluent limitations are established in accordance with the current permit, current practices regarding treated sanitary wastewater discharges in individual permits, LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD<sub>5</sub> and TSS in terms of concentration. The monitoring frequency is once every six months. These requirements have been retained from the previous LPDES permit, effective on February 1, 2003.

**Fecal Coliform** - Effluent limitations are established in accordance with the current permit, current practices regarding treated sanitary wastewater discharges in individual permits, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. The monitoring frequency has been increased from once every six months to once every three months. These requirements have been changed from the previous LPDES permit, effective on February 1, 2003.

#### **VII. TMDL Waterbodies**

Subsegment 070401, Mississippi River Basin, is listed on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators. To date, no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Mississippi River Basin, those suspected causes for impairment which are not directly attributed to this facility type have been

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eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Pathogen indicators are associated with sanitary wastewater discharges, but there are no sanitary wastewater discharges in this permit. Therefore, no additional requirements will be added to this permit.

**VIII. Compliance History/DMR Review:**

A compliance history/DMR review was done covering the period of July 2, 2006 to July 2, 2009.

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A. DMR Exceedances Reported

<u>Monitoring Date</u>	<u>PARAMETER</u>	<u>OUTFALL</u>	<u>Sample Measurement</u>	<u>Permit Requirement</u>
11-15-06	TOC	003	153.0 mg/L daily maximum	50 mg/L daily maximum
11-15-07	Fecal Coliform	102	490 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
03-27-08	Fecal Coliform	102	2400 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
04-30-08	Fecal Coliform	102	2400 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
05-15-08	Fecal Coliform	102	2400 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
06-17-08	Fecal Coliform	102	2400 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
04-30-08	TSS	102	68 mg/L daily maximum	45 mg/L daily maximum
06-17-08	TSS	102	167 mg/L daily maximum	45 mg/L daily maximum
06-17-08	BOD <sub>5</sub>	006	106 mg/L daily maximum	45 mg/L daily maximum
06-17-08	Fecal Coliform	006	2400 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
07-25-08	BOD <sub>5</sub>	006	146 mg/L daily maximum	45 mg/L daily maximum
08-12-08	BOD <sub>5</sub>	006	89 mg/L daily maximum	45 mg/L daily maximum
07-25-08	Fecal Coliform	006	519 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
08-12-08	Fecal Coliform	006	120 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
09-26-08	Fecal Coliform	102	70 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum
10-30-08	Fecal Coliform	006	19000 colonies/100 mL daily maximum	43 colonies/100 mL daily maximum



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**B. Inspections**

The last water permit routine LDEQ Compliance Evaluation Inspection (CEI) was performed on January 22, 2009. The first area of concern noted in the inspection report was permit verification being unsatisfactory for the permit addressing observations. The second area of concern noted in the inspection report was the recordkeeping and reporting evaluation being unsatisfactory for the records and reports maintained as required by the permit. The final area of concern noted in the inspection report was the effluent / receiving waters observations being unsatisfactory. However, based on visual observations only, Outfalls 001-005 had no oil sheen, grease, turbidity, visible foam, or floating solids. There was no follow-up from Enforcement or Surveillance as of July 2, 2009.

**C. Compliance History**

There are no open, appealed, or pending water enforcement actions as of July 2, 2009.

Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrated two or more consecutive years of permit compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities, and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.

**IX. "IT" Questions - Applicant's Responses**

Targa Midstream Services Limited Partnership, Venice LPG Terminal is a minor facility, therefore, IT Questions were not required to be submitted.

**X. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 070401 of the Mississippi River Basin, has not been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for any species, which are listed federally as a threatened species. Also, this type of discharge is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species, or the critical habitat.

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**XI. Historic Sites:**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**XII. Tentative Determination:**

On the basis of preliminary staff review, the Louisiana Department of Environmental Quality has made a tentative determination to re-issue a permit for the discharges described in the application.

**XIII. Variances:**

No requests for variances have been received by this Office.

**XIV. Public Notices:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public Notice published in:

Local Newspaper of general circulation;

Office of Environmental Services Public Notice Mailing List.

**XV. Stormwater Pollution Prevention Plan (SWP3) Requirement:**

In accordance with LAC 33:IX.2707.I.3 and LAC 33:IX.2707.I.4 [40 CFR 122.44(I)(3) and (4)], a narrative requirement is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. **For first time permit issuance**, the narrative requirement requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the narrative requirement requires that the Storm Water Pollution Prevention Plan (SWP3) be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft

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permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2511.B.14 [40 CFR 122.26(b)(14)].